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Comments: North Fork Stillaguamish Environmental Assessment

OBJECTION TO THE NORTH FORK STILLAGUAMISH EA and DECISION NOTICE

Some historical background is in order. During negotiations over Blanchard Mountain management designations between DNR managers, County Trust recipients and affected forest industry representatives the idea emerged that lost timber volume could come from USFS managed land and especially if a management plan were finally prepared for the Finney AMA. The notion was that the AMA could finally serve its purpose. The thought was imagined as a win, win solution.

Part of that purpose was to test innovative approaches to sustainable timber production and support local timber dependent communities.

The recent executive order from President Biden "Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies" also notes "Many local economies thrive because of these outdoor and forest management activities, including in the sustainable forest product sector." & It is also the policy of my Administration, as outlined in Conserving and Restoring America the Beautiful, to support collaborative, locally led conservation solutions. & (iii) develop, in coordination with the Secretary of Commerce, with State, local, Tribal, and territorial governments, and with the private sector, nonprofit organizations, labor unions, and the scientific community, recommendations for community-led local and regional economic development opportunities to create and sustain jobs in the sustainable forest product sector, including innovative materials, and in outdoor recreation, while supporting healthy, sustainably managed forests in timber communities.

All of the above considerations should support a decision on the North Fork Stillaguamish that promotes innovation, experimentation and sustainable (as in long term) production of timber to support a local wood products industry and the family supporting wages it pays.

My objection to the decision resulting from the North Fork Stillaguamish EA is because a self-imposed time constraint and a lack of vision are squandering the opportunity of an AMA and not addressing the economic and social implications on the timber dependent local communities.

- AMA-R & AMA-NR are conflated, treated the same with no innovation beyond what has been previously done in non-AMA.
- Riparian buffers have no experimental treatment or innovation. Fixed buffer widths do not address the direction from the Finney AMA Plan.

The response to my comments on the EA is inadequate and incomplete. The reference cited from the silvicultural specialist report merely shows why my question is asked.

Silvicultural Analysis

Page 5 Definitions of AMA NR & AMA R: R notes emphasis on old forest characteristics restoration, NR notes with ecological emphasis.

The application of one treatment, variable density thinning, on commercially viable stands, and one entry for both AMA R & NR ignores the purposeful distinction made between the two in the NWFP and its adoption into the MBSFP.

The response to comments also ignores this management plan distinction. The Peckman exemption appears to be the main driver of treatment selection. "Ecological objectives" covers more than old forest characteristics. The economic, social and community objectives are ignored.

1. The emphasis of the Finney AMA is to restore late-successional forest and riparian habitat components (USDA, USDI 1994, Page D-13).

a. "habitat components" is different from management for all non-riparian areas to be late-successional forest.

The response of "Furthermore, since the full suite of conditions identified as desirable for old forest, take many years and up to 2 or more centuries, it is best to let those natural processes occur once these stands have been provided with growing space and gaps for the development of complex structure." is unsupported.

So certain, are you? There are examples such as the White Chuck Bench Thin that show the benefits of multiple entries to adjust stand structures. Tree density in places may be better adjusted in stages, as another commentor noted, to allow root structures to grow for better tree support. Silvicultural practices done in a dynamic and changing forest environment cannot assume perfection in one go. This is especially true in the AMA-nr (non-LSR) areas where a stand age of eighty years should not be a limiting factor. Response to comment does not address this issue.

"Underplanting thinned stands with conifer species of varying degrees of shade tolerance suggests that subsequent overstorey thinning treatments will be needed to maintain some species as a component of a developing understory cohort" (Maas-Hebner et al., 2005; Chan et al., 2006).

Citations from the "Density Management and Riparian Buffer Study" - an operational scale management study. USDA, Forest Service, seem like they would be appropriate to The NFS EA analysis, especially given the direction for an "innovative & experimental" nature of treatments and an emphasis on riparian habitat components.

The adoption of a simplistic, fixed width riparian buffer scheme, on even intermittent streams, shows the driver of treatments is not science, experiment, or adaptive management, but expediency and politics.

In contrast, WA Forest Practice Rules, which cover more area and more important fish streams have zones where different treatments may occur and have an alternative plan option to deviate from the rule prescriptions under certain conditions. These are based on both experimental studies and negotiations with Tribal, conservation groups and private land managers.

The EA decision does not have even limited experimental or adaptive management for riparian buffers. Part of the purpose and need for action is the undesirable condition of 2nd growth plantation stands in the project area.

These areas were harvested with minimal to none, riparian buffers, especially on intermittent streams. They are therefore often or mostly in the same undesirable condition as the stands. This is contrary to the clear direction of an AMA and to the guidance of the Finney AMA Plan.

To resolve this objection:

- A clear plan for future management in AMA-NR. Do not treat these the same as AMA-R (LSR).
- Have some experimental riparian treatments.

Sincerely,

Paul Wagner